



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

February 28, 2023

**BY ECF**

The Honorable John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Spiegelman*, 20 Cr. 609 (JPC)**

Dear Judge Cronan:

The Government respectfully submits this letter in response to the Court's February 14, 2023 order directing the Government to file a status letter updating the Court on the progress of its investigation and either proposing a schedule for supplemental briefing or, if justified, requesting a further extension pending its continued investigation. (Dkt. No. 41).

On February 10, 2023, the U.S. Probation Office ("Probation") appraised the Court that the defendant had submitted an expedited application for a U.S. Passport to the Department of State and made plans for imminent international travel without the authorization of the Court or Probation. (Dkt. No. 38). On February 14, 2023, the Court extended sine die the deadline for the parties' supplemental briefing regarding the defendant's request for permission to travel to Russia. (Dkt. No. 41).

The Government's investigation into the aforementioned conduct remains ongoing and is expected to continue for the next thirty days. The Government therefore requests that the Court grant a further thirty-day extension to March 30, 2023 pending its continued investigation.

The Government remains available to answer any further questions of the Court.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: \_\_\_\_\_/s/\_\_\_\_\_  
Mitzi S. Steiner  
Assistant United States Attorney  
(212) 637-2284